



www.windisability.com
1-888-WIN-SSDI

250 South Clinton Street, Suite 210
Syracuse, NY 13202
Telephone: 315-701-5780, Fax: 315-701-5781

11875 High Tech Avenue, Suite 100B
Orlando, FL 32817
Telephone: 407-581-7510, Fax: 407-207-3210

Document Electronically Filed

August 10, 2021

Hon. Sarah L. Cave
United States Magistrate Judge
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, NY 1007-1312

Re: Riaz v. Commissioner of Social Security
Civil Action No: 1:20-cv-08418-JPC-SLC

Dear Judge Cave:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to file her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on August 20, 2021. Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion.

Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to file Plaintiff's Motion for Judgment on the Pleadings.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **October 19, 2021**. Subsequently, in accordance with the pattern of the Scheduling Order, the Commissioner's Response would then be due **December 20, 2021**. Plaintiff's Reply would then be due **January 3, 2022**.

Thank you for your consideration.

Respectfully submitted,

The requested extension (ECF No. 20) is GRANTED and the proposed briefing schedule is ADOPTED.

The Clerk of Court is respectfully directed to close ECF No. 20.

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

CC [via ECF]: Ariella Renee Zoltan (Counsel for Defendant)

SO ORDERED.

Dated: 8/11/2021
New York, NY

Sarah L. Cave
Honorable Sarah L. Cave
U.S. Magistrate Judge